

# SEEGERWEISS LLP

August 25, 2022

**By ECF**

Honorable Anita B. Brody  
United States District Court  
Eastern District of Pennsylvania  
James A. Byrne U.S. Courthouse  
601 Market Street, Room 7613  
Philadelphia, PA 19106

*In re NFL Players' Concussion Injury Litigation, No. 2:12-md-02323-AB*

Dear Judge Brody:

Class Counsel respectfully requests a 30-day extension of time to respond to the Motion for Relief Under Article XXVII of the Settlement Agreement (the "Motion," ECF No. 11813) filed by Settlement Class Members Troy Davis, Lynn James, Marvin Owens, Booker T. Brown, and Newton Williams. Counsel for the National Football League and NFL Properties LLC (the "NFL Parties") and counsel for Movants have both consented to this request.

Pursuant to Local Rule 7.1, Class Counsel's response is currently due on August 30, 2022; if this request is granted, the new deadline would be September 29, 2022. The request is made in light of work commitments.

A proposed order is attached.

Respectfully submitted,

/s/ Christopher A. Seeger  
Christopher A. Seeger

Enclosure

cc: All counsel of record (via ECF)

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**CERTIFICATE OF CONFERENCE**

On August 25, 2022, Class Counsel contacted counsel for the NFL Parties and Jason Luckasevic of Goldberg, Persky & White, P.C., counsel for the movants, to seek their position on Class Counsel's requested 30-day extension of time to file a response to the Motion. Counsel for the NFL Parties and Mr. Luckasevic informed Class Counsel that they do not oppose the extension request.

Date: August 25, 2022

/s/ Christopher A. Seeger  
Christopher A. Seeger

**CERTIFICATE OF SERVICE**

It is hereby certified that a true copy of the foregoing document was served electronically via the Court's electronic filing system on the 25th day of August, 2022, upon all counsel of record.

Date: August 25, 2022

/s/ Christopher A. Seeger  
Christopher A. Seeger

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

Kevin Turner and Shawn Wooden,  
*on behalf of themselves and  
others similarly situated,*

Plaintiffs,

v.

National Football League and  
NFL Properties LLC,  
successor-in-interest to  
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

No. 2:12-md-02323-AB

MDL No. 2323

**Hon. Anita B. Brody**

Civ. Action No. 14-00029-AB

**[PROPOSED] ORDER**

**WHEREAS**, Settlement Class Members Troy Davis, Lynn James, Marvin Owens, Booker T. Brown, and Newton Williams, by and through their counsel Goldberg, Persky & White, P.C., filed a Motion for Relief Under Article XXVII of the Settlement Agreement in the above-captioned matter on August 16, 2022 (the "Motion," ECF No. 11813);

**WHEREAS**, Class Counsel has requested a 30-day extension of time, until September 29, 2022, to respond to the Motion;

It is **ORDERED** that the request for an extension of time is **GRANTED**.

**SO ORDERED** this \_\_\_\_ day of \_\_\_\_\_, 2022.

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Anita B. Brody  
United States District Court Judge